

EXHIBIT 1



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December 28, 2011

VIA E-MAIL: DMarroso@OMM.com

David Marroso, Esq.
O'Melveny & Myers LLP
1999 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067-6035

Re: **Mayweather adv. Pacquiao, et al. - Production of Medical and Physical Examination Records**

Dear Mr. Marroso:

I have just been informed that you have refused to authorize the Texas Department of Licensing and Regulation to release the medical and physical examination records solicited in the Subpoena to Produce Documents, dated December 16, 2011. I understand that you have withheld such authorization despite: (i) entry of a protective order, dated November 16, 2011, in this action that applies to medical information; (ii) our assurance that any medical records received will be handled in accordance with the protective order; (iii) the limited scope of our requests seeking Pacquiao's medical and physical examination records that relate to the signs and symptoms associated with the use of performance enhancing drugs; (iv) our offer, pursuant to my December 15, 2011 letter to you, to draft a new release for Pacquiao's execution; and (v) our two (2) meet and confer discussions and considerable correspondence regarding our need to obtain Pacquiao's medical and physical examination records and their relevance to the claims and defenses raised in this action.

Due to your inexplicable refusal to provide us, or to allow others to provide us, with Pacquiao's medical and physical examination records—despite such information being uncontrovertibly relevant to the subject matter involved in the pending action and our considerable efforts to obtain such information and a release from you—we have no option but to proceed with the necessary motions to compel production of our requested discovery, as well as to seek reasonable expenses, attorneys' fees, and sanctions. We will also not be

LV 419,625,747v1

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ZURICH**
*GREENBERG TRAURIG, LLP
**STRATEGIC ALLIANCE

December 28, 2011

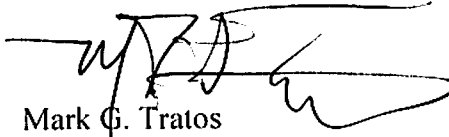
Page 2

Mayweather adv. Pacquiao

able to complete the various depositions now scheduled and will require the deponents to appear again when we have obtained the medical information. Finally, it is now clear that discovery can not be completed by January 31 because of your lack of cooperation.

Sincerely,

 GreenbergTraurig


Mark G. Tratos

cc: All Counsel

EXHIBIT 2



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December 30, 2011

OUR FILE NUMBER
869950-8

VIA E-MAIL

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**Re: Pacquiao v. Mayweather, et al.
Case No. 2:09-cv-02448 (USDC District of Nevada)**

Counsel,

We write to address outstanding discovery issues raised during our two meet-and-confer teleconferences and your letters dated December 27, 28, and 30, 2011.

In your December 28, 2011 letter, you accused Pacquiao of suppressing medical and physical examination records and insisted that you “will not be able to complete the various depositions now scheduled and will require deponents”—especially Mr. Pacquiao and Bob Arum—“to appear again when [you] have obtained the medical information.” You also claimed that because of Pacquiao’s purported “lack of cooperation,” you intend to seek an extension of the January 31, 2012 discovery cut-off. (Letter from M. Tratos dated Dec. 28, 2011 at 1-2.)

We disagree with your characterization of events. Pacquiao responded to Mayweather’s overbroad requests seeking “physical examinations” with appropriate objections (which Mayweather has never challenged) and the production of drug test results by laboratories authorized by the state athletic commissions with jurisdiction over Mr. Pacquiao’s boxing matches. (Pacquiao’s August 29 Responses and Objections to Defendants’ Third Set of Document Request Nos. 2-5.)

Mayweather initially—and erroneously—claimed Pacquiao had not produced *any* test results and then asserted—again erroneously—that Pacquiao had not produced test results from his 2010 bout in Texas. We definitively disproved these statements.

During our telephonic conference, Mayweather was forced to concede that Pacquiao had produced drug test results but argued Pacquiao did not produce what you described as “notes”

O'MELVENY & MYERS LLP

Mark Tratos, December 30, 2011 - Page 2

and “charts” from his doctors. We pointed out that Mayweather had not produced any “notes” and “charts” from his doctors. After discussion, both sides appeared to agree that notes and charts of their medical doctors (if any) are not in the fighter’s possession, custody, and control and must be independently sought.

Mayweather then served sweeping document and deposition subpoenas on the Nevada Athletic Commission (NAC) and Texas Department of Licensing (TDL) seeking, in effect, every document, medical or otherwise, related to Mr. Pacquiao in the possession of those agencies. Mayweather subsequently narrowed the request to seek “Pacquiao’s medical and physical examination records that relate to the signs and symptoms associated with the use of performance enhancing drugs.” (Letter from M. Tratos dated Dec. 28, 2011 at 1.)

When the NAC and TDL declined to disclose to Mayweather physical and medical information potentially protected by HIPAA and other laws, Mayweather asked Pacquiao to execute a blanket release authorizing NAC and TDL to disclose these documents to Mayweather without any advance review. We declined to permit the indiscriminate disclosure of personal information about Pacquiao, but notified you that we would seek to collect that information from NAC and TDL, review it, and produce to Mayweather responsive, non-privilege information.

Although we are under no obligation to do so, we have sought documents concerning Pacquiao held by NAC and TDL. As promised, we will review these materials and produce responsive, non-privilege information. We expect to be able to do so with respect to TDL documents next week and NAC documents the week of January 16. (For ease of reference and clear provenance, we will bates-label the documents NAC for Nevada Athletic Commission and TDL for Texas Department of Licensing.) Once you have had a chance to review the documents produced by Pacquiao, we can discuss any remaining issues concerning these documents.¹

Rather than involve the Court in a potentially needless motions to compel, to avoid fights over whether witnesses must be deposed twice, and to accommodate my and Mr. Petrocelli’s trial schedule, we will not oppose Mayweather’s request for an extension of the discovery period.² You have not specified a timeframe for the extension. We suggest 59 days—to Friday, March 30, 2012.

In the meantime, we will produce the medical and licensing information obtained from NAC and TDL no later than January 20, 2012. Once you have had the chance to review the documents, we will schedule Mr. Pacquiao’s, Mr. Koncz’s, and Mr. Arum’s depositions for

¹ Please confirm that Mr. Mayweather will withdraw his document and deposition subpoenas served on these third-party agencies and that we can notify Texas and Nevada that the parties will litigate or resolve remaining issues, if any, without requiring further expense from the third-parties.

² Mr. Petrocelli and I are scheduled to begin a two- to three-week trial on January 24, 2012, in the United States District Court for the Central District of California in the case *Hollywood Foreign Press Assoc. v. Red Zone Capital Partners II, L.P. et al.*, Case No. CV10-8833-AHM (FMOX).

O'MELVENY & MYERS LLP

Mark Tratos, December 30, 2011 - Page 3

mutually-convenient dates in February or early March—well before the extended discovery cut-off.

We do not believe the other depositions for which you have requested dates from us—Dr. Jeffrey Roth, Lucia McKelvey, or Timothy Sladeck—need be postponed, but let us know if you prefer to delay any of them until after you receive the NAC and TDL documents. As of now:

a. *Dr. Roth.*

We will accept service of subpoena on behalf of Dr. Roth, but he is not available on January 4 for deposition. Dr. Roth is available on January 5, 2012 starting at 1:30 p.m. and January 6 starting at 12:00 p.m.

b. *Lucia McKelvey*

Ms. McKelvey had an extremely busy late December and has out-of-the-country trips scheduled in January. We will provide available dates in January or early February shortly.

c. *Timothy Sladeck*

Mr. Pacquiao is under no obligation to provide you with an address for Mr. Sladeck. To our knowledge, Mr. Sladeck is not under Pacquiao's control. We disagree that Mayweather has any right to examine O'Melveny's or Pacquiao's "books and records" to fish for "information" related to Mr. Sladeck. Mayweather has not served any discovery or interrogatories regarding Mr. Sladeck.

For our part, in addition to the depositions of Mr. Ellerbe (January 12, 2012) and Mr. Haymon (January 27, 2012), we would like to depose Dr. Voy. Please let us know if you represent the witness. If not, we will serve him with a subpoena directly. Please also let us know your availability in January or February for the deposition of Curtis "50 Cent" Jackson.

Finally, given the fact discovery extension, we propose a concomitant extension of the deadline to disclose experts.

O'MELVENY & MYERS LLP

Mark Tratos, December 30, 2011 - Page 4

We will circulate early next week a draft stipulation for your review. Please let us know promptly if you intend to depose Dr. Roth on January 5 or 6. We need to notify him as soon as possible.

Very truly yours,

/s/ David Marroso

David Marroso
of O'MELVENY & MYERS

cc: Malcolm LaVergne, Esq.

EXHIBIT 3



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January 3, 2012

OUR FILE NUMBER
869950-8

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Re: **Pacquiao v. Mayweather, et al.**
Case No. 2:09-cv-02448 (USDC District of Nevada)

Mr. Tratos:

Your letter from yesterday is replete with incomplete and demonstrably wrong statements and appears calculated to create a misleading record. Our preference is to focus on the future—what is left to be done to complete discovery and proceed to trial—but you left us no choice but to correct the historical record first.

1. **Medical Records**

Mayweather badly mischaracterizes our position with respect to Pacquiao's medical records. To be clear, it is not our position that Mayweather is not entitled to any medical records or only those "medical records that relate specifically to blood tests and urine tests." (Letter from M. Tratos dated Jan. 1, 2012.) Rather, as we explained during our telephonic conference and again in our letter dated December 30:

- Pacquiao already produced the production of drug test results by laboratories authorized by the state athletic commissions with jurisdiction over Mr. Pacquiao's boxing matches.
- Pacquiao and Mayweather appeared to agree that "notes" and "charts" of their medical doctors (if any) are not in the fighter's possession, custody, and control and must be independently sought from the medical professionals themselves. To that end, we deposed physical therapist Jodi Johnson and requested the deposition of Dr. Voy. Ms. Johnson testified that she kept a chart on Mr. Mayweather, but none has been produced to date.

O'MELVENY & MYERS LLP

Mark Tratos, January 3, 2012 - Page 2

- Mayweather served sweeping document and deposition subpoenas on the Nevada Athletic Commission (NAC) and Texas Department of Licensing (TDL) seeking, in effect, every document, medical or otherwise, related to Mr. Pacquiao in the possession of those agencies. In response to our telephonic conference, Mayweather agreed to narrow his requests for documents from NAC and TDL to—in your words—“Pacquiao’s medical and physical examination records that relate to signs and symptoms associated with the use of performance-enhancing drugs.” (Letter from M. Tratos dated Dec. 28, 2011 at 1.)
- Although Pacquiao is under no obligation to do so, Pacquiao sought documents concerning Pacquiao held by NAC and TDL. As I explained to Mr. Kummer last week and confirmed in our letter, we will review these documents, redact personal or confidential information (e.g., Social Security number), and produce “medical and physical examination records that relate to signs and symptoms associated with the use of performance-enhancing drugs.”

In short, Pacquiao has produced all medical records in his possession, custody and control responsive to your document requests and, going beyond his obligations, obtained documents from third-parties NAC and TDL in order to facilitate discovery. There is absolutely no basis for Mayweather to move to compel.

We are confused by your statement that Mayweather “can not agree to a specific 59 day extension of time not knowing whether or not [Mayweather] will be able to get those medical records [from NAC and TDL] in that time frame.” (Letter from M. Tratos dated Jan. 1, 2012.) It was Mayweather, not Pacquiao, who initially asked for an extension of the discovery period in order to ensure that he obtained the NAC and TDL documents before the close of discovery. (Letter from M. Tratos dated Dec. 28, 2011.) Moreover, our letter could not have been clearer about when we expect to produce the NAC and TDL documents: “[W]e will produce all the medical and licensing information obtained from NAC and TDL no later than January 20, 2012.” (Letter from D. Marroso dated Dec. 30, 2011.)¹

Therefore, there is no question Mayweather will receive medical documents obtained from NAC and TDL in sufficient time to review and take any depositions before the proposed extended March 30, 2012 discovery cut-off.

¹ You are wrong to suggest that the materials from TDL and NAC could be “immediately produced.” Given the relative volume of materials, “[w]e expect to be able to [review, redact, and produce] with respect to TDL documents [this] week and NAC documents the week of January 16.” (Letter from D. Marroso dated Dec. 30, 2011.)

O'MELVENY & MYERS LLP

Mark Tratos, January 3, 2012 - Page 3

2. Depositions

a. *Bob Arum and Manny Pacquiao*

We are also confused by your statement that “any references” to the depositions of Bob Arum and Manny Pacquiao were “conspicuously absent” from our December 30 letter. Our letter (a) pointed out that Mayweather took the position that Mr. Pacquiao and Mr. Arum would have to “appear again” for depositions when Mayweather “obtain[s] the medical information”; (b) made clear we would not consent to multiple depositions of the same individuals; (c) proposed a schedule for disclosure of medical records and depositions by January 20, 2012; and (d) specifically stated “[o]nce you have had the chance to review the documents, we will schedule Mr. Pacquiao’s, Mr. Koncz’s, and Mr. Arum’s depositions for mutually-convenient dates in February or early March—well before the extended discovery cut-off.” For these reasons, we do not plan to have Mr. Pacquiao, Mr. Koncz, and Mr. Arum examined this week.

Given our trial schedule, we are trying to schedule Mr. Pacquiao’s, Mr. Koncz’s, and Mr. Arum’s depositions for the weeks of February 20 and 27—after you will have received the TDL and NAC documents and well before the proposed March 30, 2012 discovery cut-off. We will notify you of specific dates forthwith.

b. *Dr. Jeffrey Roth*

Dr. Roth is available for deposition in Las Vegas on January 5, 2012 starting at 1:30 p.m. and January 6 starting at 12:00 p.m. (Your letter inexplicably ignored the January 6 option.) Please let us know immediately which date / time you prefer. We will accept service of a subpoena on Dr. Roth.

c. *Lucia McKelvey*

This week, we expect to be able to provide available dates for Ms. McKelvey’s deposition. We expect the deposition will take place in late January or early February, probably in Washington D.C., where Ms. McKelvey resides.

d. *Timothy Sladeck*

You have identified no statute, rule, or authority—and we are aware of none—that requires Mr. Pacquiao to search for and identify contact information for a third-party individual whom is not employed by or under the control of Mr. Pacquiao, especially in response to an informal letter request rather than a formal discovery request. We will consider any authority you have to the contrary.

We do not know Mr. Sladeck’s background nor whether your description of his past is accurate. Needless to say, we reserve all rights to object to any subpoena you may serve on Mr. Sladeck or discovery you may seek to obtain from or about him.

O'MELVENY & MYERS LLP

Mark Tratos, January 3, 2012 - Page 4

e. Pacquiao's Requested Depositions

You did not respond to inquiry regarding Dr. Voy. Please let us know immediately if you represent the witness. If not, we will serve him with a subpoena directly. Please also let us know your availability in January or February for the deposition of Curtis "50 Cent" Jackson.

3. Stipulation

Attached is a draft stipulation to extend the discovery period 59 days, until March 30, 2012.

Please let us know if you have any comments and whether we are authorized to sign on your behalf.

Very truly yours,

/s/ David Marroso

David Marroso
of O'MELVENY & MYERS

cc: Malcolm LaVergne, Esq.

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11 Fax: (702) 369-2666
12 Attorneys for Plaintiff and Counter-Defendant
13 Emmanuel "Manny" Pacquiao

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

17 EMMANUEL PACQUIAO, a Philippines
resident,

18 Plaintiff,

19 v.

20 FLOYD MAYWEATHER, JR., a Nevada
21 resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
22 MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
23 Nevada limited liability company,;

24 Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING EXTENSION
OF THE DISCOVERY CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken six depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and continued to meet and confer on additional production-related issues;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

WHEREAS, the parties have not requested an extension of fact discovery in this case;

1 WHEREAS, the Court has yet to set a trial date in this matter;

2 NOW THEREFORE, the parties, through their respective counsel of record, agree and
3 stipulate and respectfully request:

4 (a) a fifty-nine (59) day extension of the discovery cutoff from January 31, 2012 to March
5 30, 2012;

6 (b) expert disclosures under Fed. R. Civ. P 26(a)(2) due on February 1, 2012;

7 (c) rebuttal expert disclosures due on March 1, 2012

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(e) all dispositive motions filed on or before May 1, 2012.

Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

By: /s/ David Marroso

David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

By: /s/ Mark Tratos

Mark Tratos
Attorneys for Defendants Floyd Mayweather,
Jr. and Mayweather Promotions

Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

By: /s/ Malcolm LaVergne

Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

1 DATED: _____

2 IT IS SO ORDERED.

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4 _____
5 UNITED STATES DISTRICT COURT JUDGE
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EXHIBIT 4



Mark G. Tratos
Tel 702.792.3773
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January 11, 2012

VIA E-MAIL: hwhitman@OMM.com

Harrison Whitman, Esq.
O'Melveny & Myers LLP
1999 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067-6035

Re: Mayweather adv. Pacquiao, et al. - Dates Certain for Witnesses/Proposed Stipulation

Dear Harrison:

In response to your letter of earlier today, January 11, 2012, we strongly disagree with your characterizations. You have been telling us for months that you will provide Mr. Pacquiao and yet, when you did so, you only agreed to make him available on Sunday, January 8, 2012 and then withdrew that offer because we told you we would seek to continue his deposition should we not have the medical records that we were entitled to before he was deposed. As recently as last week, you were assuring us that we would have dates certain for Mr. Pacquiao, Mr. Arum, and other witnesses earlier this week. It is now nearing the end of business on Wednesday and we still have not received a single date certain for the primary witnesses.

I am enclosing a copy of our revised proposed stipulation but I have been instructed, as I told you last night in our telephone call, not to sign any stipulation that did not expressly contain dates certain for these witnesses' depositions. Accordingly, we will sign the stipulation as it is drafted if you will provide the dates that you have repeatedly promised, but have failed yet to deliver. If we do not receive the stipulation by close of business today, we will assume that you are unwilling to provide dates certain and we will proceed with filing our motion to extend discovery.

Sincerely,

 GreenbergTraurig


Mark G. Tratos

cc: All Counsel

LV 419,642,222v1

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Attorneys for Plaintiff and Counter-Defendant

Emmanuel "Manny" Pacquiao

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMMANUEL PACQUIAO, a Philippines
resident,

Plaintiff,

v.

FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
Nevada limited liability company,,

Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken six depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and continued to meet and confer on additional production-related issues; regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence and his deposition has been delayed or disputed several times;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

1 WHEREAS, the parties have approximately fifteen depositions left to be taken in addition
2 to experts;

3 WHEREAS, Floyd Mayweather and Mayweather Promotions ("Mayweather Parties")
4 have filed an emergency motion to compel discovery which is pending;

5 WHEREAS, the Mayweather Parties desire to have specific dates set for the depositions of
6 Manny Pacquiao and Michael Koncz as part of this stipulation;

7 WHEREAS, the parties have not previously requested an extension of fact discovery in
8 this case;

9 WHEREAS, the Court has yet to set a trial date in this matter;

10 NOW THEREFORE, the parties, through their respective counsel of record, agree and
11 stipulate and respectfully request:

12 (a) a sixty (60) day extension from the date the Court orders Plaintiffs to produce the
13 documents, subject to the motion to compel or if the Court denies the motion, sixty (60) days
14 from the denial of the motion to compel;

15 (b) the deposition of Manny Pacquiao be set for February ___, 2012 at the hour of 9:30
16 a.m. at the offices of Greenberg Traurig, LLP, 3773 Howard Hughes Parkway, Suite 400 North,
17 Las Vegas, Nevada;

18 (c) the deposition of Michael Koncz be set for February ___, 2012 at the hour of 9:30 a.m.
19 at the offices of Greenberg Traurig, LLP, 3773 Howard Hughes Parkway, Suite 400 North, Las
20 Vegas, Nevada;

21 (d) the deposition of Bob Arum be set (3) three days before or after Manny Pacquiao's
22 deposition on February ___, 2012 at the hour of 9:30 a.m. at the offices of Greenberg Traurig,
23 LLP, 3773 Howard Hughes Parkway, Suite 400 North, Las Vegas, Nevada.

24 (e) the deposition of Lucia McKelvey will be set for February ___, 2012 at the hour of
25 9:30 a.m. at the offices of Greenberg Traurig, LLP, 3773 Howard Hughes Parkway, Suite 400
26 North, Las Vegas, Nevada;

27 (f) expert disclosures under Fed. R. Civ. P 26(a)(2) due on February 10, 2012;

28 (eg) rebuttal expert disclosures due on March 10, 2012

1 ///

2 ///

3 //

4 //

5 //

6 //

7 //

8 //

9 (f) all dispositive motions filed on or before May 1, 2012.

10

11 Dated: January 1, 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

12

13

14

By: /s/ David Marroso
David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

15

16

Dated: January 1, 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

17

18

19

By: /s/ Mark Tratos
Mark Tratos
Attorneys for Defendants Floyd Mayweather,
Jr. and Mayweather Promotions

20

21

Dated: January 1, 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

22

23

24

By: /s/ Malcolm LaVergne
Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

25

26

27

28

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

Document comparison by Workshare Professional on Wednesday, January 11, 2012
3:01:16 PM

Input:	
Document 1 ID	interwovenSite://LV-DMS1/LV/419640608/2
Description	#419640608v2<LV> - Proposed Stipulation re Extension of Discovery Cutoff (from Plaintiff's Counsel)
Document 2 ID	interwovenSite://LV-DMS1/LV/419640608/3
Description	#419640608v3<LV> - Proposed Stipulation re Extension of Discovery Cutoff (from Plaintiff's Counsel) w MGTs changes
Rendering set	standard

Legend:	
<u>Insertion</u>	
Deletion	
Moved from	
<u>Moved to</u>	
Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	14
Deletions	13
Moved from	0
Moved to	0
Style change	0
Format changed	0
Total changes	27

EXHIBIT 5

From: Whitman, Harrison
Sent: Sunday, January 15, 2012 8:57 PM
To: 'kummert@gtlaw.com'; 'TratosM@gtlaw.com'; 'BurrellL@gtlaw.com'; 'ChavezR@gtlaw.com'; 'robertsde@gtlaw.com'; 'neyc@gtlaw.com'; 'rabeb@gtlaw.com'
Cc: Petrocelli, Daniel; Marroso, David; Welsh, Robert; 'EHone@GORDONSILVER.com'; 'FVanburen@GORDONSILVER.com'; 'mlavergne@lavergnelaw.com'
Subject: Pacquiao v. Mayweather Jr. et al.
Attachments: WS_BinaryComparison_419640608_3-1.15.2012 Stipulation.pdf; 1.15.2012 Stipulation.DOC

Counsel,

Attached is a revised Stipulation Regarding First Extension of the Discovery Cutoff. We do not think it appropriate for the parties to request an open-ended discovery cutoff. However, to address your professed concern about having sufficient time to review documents before the close of discovery, we will not object to a 90-day extension of discovery from January 31 to April 30, 2012, with adjusted dates for expert disclosures and motions.

Please let us know if we have your approval to file with the Court.

Regards,

Harrison A. Whitman
O'Melveny & Myers LLP
1999 Avenue of the Stars, Suite 700
Los Angeles, California 90067
Direct Line: 310.246.8447 | Fax: 310.246.6779
hwhitman@omm.com

DANIEL M. PETROCELLI (Cal S.B. #97802)
(admitted *pro hac vice*)

dpetrocelli@omm.com

DAVID MARROSO (Cal. S.B. #211655)

(admitted *pro hac vice*)

dmarroso@omm.com

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1999 Avenue of the Stars, 7th Floor

Los Angeles, CA 90067-6035

Telephone: (310) 553-6700

Facsimile: (310) 246-6779

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ehone@gordonsilver.com

FRANCHESCA V. VAN BUREN

Nevada Bar No. 10260

fvanburen@gordonsilver.com

GORDON SILVER

3960 Howard Hughes Pkwy., 9th Floor

Las Vegas, Nevada 89169

Tel: (702) 796-5555

Fax: (702) 369-2666

Attorneys for Plaintiff and Counter-Defendant

Emmanuel "Manny" Pacquiao

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMMANUEL PACQUIAO, a Philippines
resident,

Plaintiff,

v.

FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
Nevada limited liability company,,

Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken ~~six~~seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and continued to meet and confer on additional production-related issues regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence and his deposition has been delayed or disputed several times;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

1 WHEREAS, the parties have ~~approximately fifteen~~additional depositions left to be taken
2 in addition to experts;

3 WHEREAS, Floyd Mayweather and Mayweather Promotions ("Mayweather Parties")
4 have filed an emergency motion to compel discovery which is pending;

5 ~~WHEREAS, the Mayweather Parties desire to have specific dates set for the depositions of~~
6 ~~Manny Pacquiao and Michael Konez as part of this stipulation;~~

7 WHEREAS, the parties have not previously requested an extension of fact discovery in
8 this case;

9 WHEREAS, the Court has yet to set a trial date in this matter;

10 WHEREAS, Plaintiff has identified specific dates in February and early March 2012 for
11 the depositions of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey and
12 agreed to accept service of Notices of Deposition and Subpoenas on behalf of each individual
13 (subject to all objections except for proper service);

14 NOW THEREFORE, the parties, through their respective counsel of record, agree and
15 stipulate and respectfully request:

16 (a) a ~~sixty (60) day extension from the date the Court orders Plaintiffs to produce the~~
17 ~~documents, subject to the motion to compel or if the Court denies the motion, sixty (60) days~~
18 ~~from the denial of the motion to compel;~~ninety (90) day extension of discovery from January 31,
19 2012 to April 30, 2012;

20 ~~(b) the deposition of Manny Pacquiao be set for February ____, 2012 at the hour of 9:30~~
21 ~~a.m. at the offices of Greenberg Traurig, LLP, 3773 Howard Hughes Parkway, Suite 400 North,~~
22 ~~Las Vegas, Nevada;~~

23 ~~(c) the deposition of Michael Konez be set for February ____, 2012 at the hour of 9:30 a.m.~~
24 ~~at the offices of Greenberg Traurig, LLP, 3773 Howard Hughes Parkway, Suite 400 North, Las~~
25 ~~Vegas, Nevada;~~

26 ~~(d) the deposition of Bob Arum be set (3) three days before or after Manny Pacquiao's~~
27 ~~deposition on February ____, 2012 at the hour of 9:30 a.m. at the offices of Greenberg Traurig,~~
28 ~~LLP, 3773 Howard Hughes Parkway, Suite 400 North, Las Vegas, Nevada.~~

(e) ~~the deposition of Lucia McKelvey will be set for February _____, 2012 at the hour of 9:30 a.m. at the offices of Greenberg Traurig, LLP, 3773 Howard Hughes Parkway, Suite 400 North, Las Vegas, Nevada;~~

(f) expert disclosures under Fed. R. Civ. P 26(a)(2) due on ~~February 10~~, March 9, 2012;

(g) rebuttal expert disclosures due on ~~March 10~~, April 6, 2012;

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(h) all dispositive motions filed on or before May ~~1~~, 30, 2012.

1 Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

2
3
4 By: /s/ David Marroso
David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

5
6 Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

7
8
9 By: /s/ Mark Tratos
Mark Tratos
Attorneys for Defendants Floyd Mayweather,
10 Jr. and Mayweather Promotions

11 Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

12
13
14 By: /s/ Malcolm LaVergne
Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DANIEL M. PETROCELLI (Cal S.B. #97802)
(admitted *pro hac vice*)

dpetrocelli@omm.com

DAVID MARROSO (Cal. S.B. #211655)

(admitted *pro hac vice*)

dmarroso@omm.com

O'MELVENY & MYERS LLP

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Telephone: (310) 553-6700

Facsimile: (310) 246-6779

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ehone@gordonsilver.com

FRANCESCA V. VAN BUREN

Nevada Bar No. 10260

fvanburen@gordonsilver.com

GORDON SILVER

3960 Howard Hughes Pkwy., 9th Floor

Las Vegas, Nevada 89169

Tel: (702) 796-5555

Fax: (702) 369-2666

Attorneys for Plaintiff and Counter-Defendant

Emmanuel "Manny" Pacquiao

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMMANUEL PACQUIAO, a Philippines
resident,

Plaintiff,

v.

FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
Nevada limited liability company,;

Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and continued to meet and confer on additional production-related issues regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence and his deposition has been delayed or disputed several times;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

WHEREAS, the parties have additional depositions left to be taken in addition to experts;

1 WHEREAS, Floyd Mayweather and Mayweather Promotions (“Mayweather Parties”)
2 have filed an emergency motion to compel discovery which is pending;

3 WHEREAS, the parties have not previously requested an extension of fact discovery in
4 this case;

5 WHEREAS, the Court has yet to set a trial date in this matter;

6 WHEREAS, Plaintiff has identified specific dates in February and early March 2012 for
7 the depositions of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey and
8 agreed to accept service of Notices of Deposition and Subpoenas on behalf of each individual
9 (subject to all objections except for proper service);

10 NOW THEREFORE, the parties, through their respective counsel of record, agree and
11 stipulate and respectfully request:

12 (a) a ninety (90) day extension of discovery from January 31, 2012 to April 30, 2012;

13 (f) expert disclosures under Fed. R. Civ. P 26(a)(2) due on March 9, 2012;

14 (g) rebuttal expert disclosures due on April 6, 2012;

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1 (h) all dispositive motions filed on or before May 30, 2012.

2
3 Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

4
5
6 By: /s/ David Marroso

David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

7
8 Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

9
10 By: /s/ Mark Tratos

11 Mark Tratos
Attorneys for Defendants Floyd Mayweather,
12 Jr. and Mayweather Promotions

13 Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

14
15 By: /s/ Malcolm LaVergne

16 Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

EXHIBIT 6

From: Malcolm LaVergne [mlavergne@lavernelaw.com]
Sent: Tuesday, January 17, 2012 12:40 PM
To: Whitman, Harrison; 'kummert@gtlaw.com'; 'TratosM@gtlaw.com'; 'BurrellL@gtlaw.com'; 'ChavezR@gtlaw.com'; 'robertsde@gtlaw.com'; 'neyc@gtlaw.com'; 'rabeb@gtlaw.com'
Cc: Petrocelli, Daniel; Marroso, David; Welsh, Robert; 'EHone@GORDONSILVER.com'; 'FVanburen@GORDONSILVER.com'; Ryan Orner
Subject: Re: Pacquiao v. Mayweather Jr. et al. -- REVISIONS TO DRAFT STIPULATION TO EXTEND
Attachments: 1.15.2012 Stipulation with Redlines.001.doc

See attachment with one minor revision ... otherwise, approved as to Mayweather, Sr. Malcolm.

Malcolm P. LaVergne, Esq.
The LaVergne Law Group
1212 South Casino Center Boulevard
Las Vegas, Nevada 89104
702.448.7981, Ext. 112
702.966.3117 (Facsimile)

From: "Whitman, Harrison" <hwhitman@omm.com>
To: "kummert@gtlaw.com" <kummert@gtlaw.com>; "TratosM@gtlaw.com" <TratosM@gtlaw.com>; "BurrellL@gtlaw.com" <BurrellL@gtlaw.com>; "ChavezR@gtlaw.com" <ChavezR@gtlaw.com>; "robertsde@gtlaw.com" <robertsde@gtlaw.com>; "neyc@gtlaw.com" <neyc@gtlaw.com>; "rabeb@gtlaw.com" <rabeb@gtlaw.com>
Cc: "Petrocelli, Daniel" <DPetrocelli@OMM.com>; "Marroso, David" <DMarroso@OMM.com>; "Welsh, Robert" <rwelsh@OMM.com>; "EHone@GORDONSILVER.com" <EHone@GORDONSILVER.com>; "FVanburen@GORDONSILVER.com" <FVanburen@GORDONSILVER.com>; "mlavergne@lavernelaw.com" <mlavergne@lavernelaw.com>
Sent: Sunday, January 15, 2012 8:57 PM
Subject: Pacquiao v. Mayweather Jr. et al.

Counsel,

Attached is a revised Stipulation Regarding First Extension of the Discovery Cutoff. We do not think it appropriate for the parties to request an open-ended discovery cutoff. However, to address your professed concern about having sufficient time to review documents before the close of discovery, we will not object to a 90-day extension of discovery from January 31 to April 30, 2012, with adjusted dates for expert disclosures and motions.

Please let us know if we have your approval to file with the Court.

Regards,

Harrison A. Whitman
O'Melveny & Myers LLP
1999 Avenue of the Stars, Suite 700
Los Angeles, California 90067
Direct Line: 310.246.8447 | Fax: 310.246.6779
hwhitman@omm.com

1 DANIEL M. PETROCELLI (Cal S.B. #97802)
(admitted *pro hac vice*)
2 dpetrocelli@omm.com
DAVID MARROSO (Cal. S.B. #211655)
3 (admitted *pro hac vice*)
dmarroso@omm.com
4 O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 7th Floor
5 Los Angeles, CA 90067-6035
Telephone: (310) 553-6700
6 Facsimile: (310) 246-6779

7 ERIC D. HONE
Nevada Bar No. 8449
8 ehone@gordonsilver.com
FRANCHESCA V. VAN BUREN
9 Nevada Bar No. 10260
fvanburen@gordonsilver.com
10 GORDON SILVER
3960 Howard Hughes Pkwy., 9th Floor
11 Las Vegas, Nevada 89169
Tel: (702) 796-5555
12 Fax: (702) 369-2666
Attorneys for Plaintiff and Counter-Defendant
13 Emmanuel "Manny" Pacquiao

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA
16

17 EMMANUEL PACQUIAO, a Philippines
resident,

18 Plaintiff,
19

20 v.

21 FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
22 MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
23 Nevada limited liability company,;

24 Defendants.
25
26
27
28

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and continued to meet and confer on additional production-related issues regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence and his deposition has been delayed or disputed several times;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

WHEREAS, the parties have additional depositions left to be taken in addition to experts;

1 WHEREAS, Floyd Mayweather and Mayweather Promotions (“Mayweather Parties”)
2 have filed an emergency motion to compel discovery which is pending;

3 WHEREAS, the parties have not previously requested an extension of fact discovery in
4 this case;

5 WHEREAS, the Court has yet to set a trial date in this matter;

6 WHEREAS, Plaintiff has identified specific dates in February and early March 2012 for
7 the depositions of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey and
8 agreed to accept service of Notices of Deposition and Subpoenas on behalf of each individual
9 (subject to all objections except for proper service);

10 NOW THEREFORE, the parties, through their respective counsel of record, agree and
11 stipulate and respectfully request:

12 (a) a ninety (90) day extension of discovery from January 31, 2012 to April 30, 2012;

13 (f) expert disclosures under Fed. R. Civ. P 26(a)(2) due on March 9, 2012;

14 (g) rebuttal expert disclosures due on April 6, 2012;

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1 (h) all dispositive motions filed on or before May 30, 2012.

2
3 Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

4
5
6 By: /s/ David Marroso

David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

7
8 Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

9
10 By: /s/ Mark Tratos

11 Mark Tratos
Attorneys for Defendants Floyd Mayweather,
12 Jr. and Mayweather Promotions

13 Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

14
15 By: /s/ Malcolm LaVergne

16 ~~Mark Tratos~~ Malcolm LaVergne
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

EXHIBIT 7

From: neyc@gtlaw.com
Sent: Thursday, January 26, 2012 12:40 PM
To: Whitman, Harrison; Marroso, David; Petrocelli, Daniel; EHone@GORDONSILVER.com; FVanburen@GORDONSILVER.com; mlavergne@lavergnelaw.com
Cc: TratosM@gtlaw.com; kummert@gtlaw.com; BurrellL@gtlaw.com; rabe@gtlaw.com; overtonp@gtlaw.com; weissst@gtlaw.com; robertsde@gtlaw.com; ChavezR@gtlaw.com
Subject: Pacquiao (Proposed Stipulation for extension)
Attachments: Proposed Stipulation re Extension of Discovery.doc; Proposed Stipulation for extension.pdf

<<Proposed Stipulation for extension.pdf>>
Being sent on Mark Tratos' behalf, attached please find a proposed stipulation for extension of discovery along with a PDF version reflecting the redline changes. Please advise if the attached is acceptable to you. Thank you.

Cynthia Ney
Paralegal
Greenberg Traurig, LLP | Suite 400 North
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169
Tel 702.599.8009
neyc@gtlaw.com | www.gtlaw.com

USA LAW FIRM OF THE YEAR, CHAMBERS GLOBAL AWARDS 2007

ALBANY * AMSTERDAM * ATLANTA * AUSTIN * BOSTON * CHICAGO * DALLAS *
DELAWARE * DENVER * FORT LAUDERDALE * HOUSTON * LAS VEGAS * LONDON* *
LOS ANGELES * MEXICO CITY+ * MIAMI * NEW JERSEY * NEW YORK * ORANGE
COUNTY * ORLANDO * PALM BEACH COUNTY * PHILADELPHIA * PHOENIX *
SACRAMENTO * SAN FRANCISCO * SHANGHAI * SILICON VALLEY * TALLAHASSEE *
TAMPA * TYSONS CORNER * WASHINGTON, D.C. * WHITE PLAINS
*OPERATES AS GREENBERG TRAURIG MAHER LLP +OPERATES AS GREENBERG
TRAURIG, S.C.

STRATEGIC ALLIANCES WITH INDEPENDENT LAW FIRMS
MILAN * ROME

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

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<http://www.gtlaw.com/>

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Las Vegas, Nevada 89169

Tel: (702) 796-5555

Fax: (702) 369-2666

Attorneys for Plaintiff and Counter-Defendant

Emmanuel "Manny" Pacquiao

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMMANUEL PACQUIAO, a Philippines
resident,

Plaintiff,

v.

FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
Nevada limited liability company,;

Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and the Defendants have filed motions to compel discovery regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence and his deposition has been delayed or disputed several times;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

WHEREAS, the parties have many more additional depositions left to be taken in addition to experts;

1 WHEREAS, Floyd Mayweather and Mayweather Promotions (“Mayweather Parties”)
2 have filed Motions to Compel discovery which are pending;

3 WHEREAS, the parties have not previously requested an extension of fact discovery in
4 this case;

5 WHEREAS, the Court has yet to set a trial date in this matter;

6 WHEREAS, Plaintiff has identified specific dates in February and early March 2012 for
7 the depositions of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey and
8 agreed to accept service of Notices of Deposition and Subpoenas on behalf of each individual
9 (subject to all objections except for proper service); And a deposition date in February for
10 Attorney Michael Heitner but have declined to accept service.

11 NOW THEREFORE, the parties, through their respective counsel of record, agree and
12 stipulate and respectfully request:

13 (a) a one-hundred twenty (120) day extension of discovery from January 31, 2012 to May
14 31, 2012;

15 (f) expert disclosures under Fed. R. Civ. P 26(a)(2) due on April 1, 2012;

16 (g) rebuttal expert disclosures due on May 1, 2012;

17 (h) all dispositive motions filed on or before June 30, 2012.

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Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

By: /s/ David Marroso
David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

By: /s/ Mark Tratos
Mark Tratos
Attorneys for Defendants Floyd Mayweather,
Jr. and Mayweather Promotions

Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

By: /s/ Malcolm LaVergne
Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

David Marroso

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

1 DANIEL M. PETROCELLI (Cal S.B. #97802)
(admitted *pro hac vice*)
2 dpetrocelli@omm.com
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6 Facsimile: (310) 246-6779

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Tel: (702) 796-5555
12 Fax: (702) 369-2666
Attorneys for Plaintiff and Counter-Defendant
13 Emmanuel "Manny" Pacquiao

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA
16

17 EMMANUEL PACQUIAO, a Philippines
resident,

18 Plaintiff,
19

20 v.

21 FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
22 MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
23 Nevada limited liability company,;

24 Defendants.
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Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and the Defendants have filed motions to compel discovery regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional and other duties, in addition to his foreign residence and his deposition has been delayed or disputed several times;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—are scheduled to commence a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

WHEREAS, the parties have many more additional depositions left to be taken in addition

1 to experts;

2 WHEREAS, Floyd Mayweather and Mayweather Promotions ("Mayweather Parties")
3 have filed Motions to Compel discovery which are pending;

4 WHEREAS, the parties have not previously requested an extension of fact discovery in
5 this case;

6 WHEREAS, the Court has yet to set a trial date in this matter;

7 WHEREAS, Plaintiff has identified specific dates in February and early March 2012 for
8 the depositions of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey and
9 agreed to accept service of Notices of Deposition and Subpoenas on behalf of each individual
10 (subject to all objections except for proper service); And a deposition date in February for
11 Attorney Michael Heitner but have declined to accept service.

12 NOW THEREFORE, the parties, through their respective counsel of record, agree and
13 stipulate and respectfully request:

14 (a) a one-hundred twenty (120) day extension of discovery from January 31, 2012 to May
15 31, 2012;

16 (f) expert disclosures under Fed. R. Civ. P 26(a)(2) due on April 1~~5~~, 2012;

17 (g) rebuttal expert disclosures due on May 1~~5~~, 2012;

18 (h) all dispositive motions filed on or before ~~May 31~~June 30, 2012.

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4 Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

5
6
7 By: /s/ David Marroso

8 David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

9 Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

10
11 By: /s/ Mark Tratos

12 Mark Tratos
Attorneys for Defendants Floyd Mayweather,
13 Jr. and Mayweather Promotions

14 Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

15
16 By: /s/ Malcolm LaVergne

17 Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

EXHIBIT 8

From: Whitman, Harrison
Sent: Friday, January 27, 2012 1:04 PM
To: neyc@gtlaw.com; TratosM@gtlaw.com; kummert@gtlaw.com; BurrellL@gtlaw.com; rabeb@gtlaw.com; overtonp@gtlaw.com; weisst@gtlaw.com; robertsde@gtlaw.com; ChavezR@gtlaw.com
Cc: Marroso, David; Petrocelli, Daniel; Welsh, Robert; EHone@GORDONSILVER.com; FVanburen@GORDONSILVER.com; mlavergne@lavergnelaw.com
Subject: RE: Pacquiao (Proposed Stipulation for extension)
Attachments: Proposed Stipulation re Extension of Discovery.doc; WSComparison_Proposed Stipulation re Extension of Discovery.pdf

Please find attached our revised stipulation and a redline of the changes from the stipulation circulated yesterday. Please let us know if we are authorized to file on your behalf.

Regards,

Harrison

-----Original Message-----

From: neyc@gtlaw.com [<mailto:neyc@gtlaw.com>]
Sent: Thursday, January 26, 2012 12:40 PM
To: Whitman, Harrison; Marroso, David; Petrocelli, Daniel; EHone@GORDONSILVER.com; FVanburen@GORDONSILVER.com; mlavergne@lavergnelaw.com
Cc: TratosM@gtlaw.com; kummert@gtlaw.com; BurrellL@gtlaw.com; rabeb@gtlaw.com; overtonp@gtlaw.com; weist@gtlaw.com; robertsde@gtlaw.com; ChavezR@gtlaw.com
Subject: Pacquiao (Proposed Stipulation for extension)

<<Proposed Stipulation for extension.pdf>>
Being sent on Mark Tratos' behalf, attached please find a proposed stipulation for extension of discovery along with a PDF version reflecting the redline changes. Please advise if the attached is acceptable to you. Thank you.

Cynthia Ney
Paralegal
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3773 Howard Hughes Parkway | Las Vegas, Nevada 89169
Tel 702.599.8009
neyc@gtlaw.com | www.gtlaw.com

USA LAW FIRM OF THE YEAR, CHAMBERS GLOBAL AWARDS 2007

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LOS ANGELES * MEXICO CITY+ * MIAMI * NEW JERSEY * NEW YORK * ORANGE
COUNTY * ORLANDO * PALM BEACH COUNTY * PHILADELPHIA * PHOENIX *
SACRAMENTO * SAN FRANCISCO * SHANGHAI * SILICON VALLEY * TALLAHASSEE *
TAMPA * TYSONS CORNER * WASHINGTON, D.C. * WHITE PLAINS
*OPERATES AS GREENBERG TRAURIG MAHER LLP +OPERATES AS GREENBERG
TRAURIG, S.C.

STRATEGIC ALLIANCES WITH INDEPENDENT LAW FIRMS
MILAN * ROME

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Tel: (702) 796-5555
12 Fax: (702) 369-2666
Attorneys for Plaintiff and Counter-Defendant
13 Emmanuel "Manny" Pacquiao

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

17 EMMANUEL PACQUIAO, a Philippines
resident,

18 Plaintiff,

19 v.

20 FLOYD MAYWEATHER, JR., a Nevada
21 resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
22 MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
23 Nevada limited liability company,;

24 Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and the Defendants have filed motions to compel discovery regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional, other duties and his foreign residence;

WHEREAS, the parties will meet and confer in good faith to reschedule the depositions of Leonard Ellerbe and Al Haymon and Plaintiff Pacquiao will notice those depositions accordingly;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—commenced a two-to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6, 2011, but was postponed at the last minute when the case was reassigned to a new judge);

1 WHEREAS, the parties have additional depositions left to be taken in addition to experts;

2 WHEREAS, Floyd Mayweather and Mayweather Promotions ("Mayweather Parties")

3 have filed Motions to Compel discovery which are pending; WHEREAS, the parties have not

4 previously requested an extension of fact discovery in this case;

5 WHEREAS, the Court has yet to set a trial date in this matter;

6 WHEREAS, Defendants have noticed depositions in February and early March 2012 for

7 the examinations of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey, and

8 Plaintiff has accepted service of the Notices of Deposition and Subpoenas on behalf of each

9 individual (subject to all objections except for proper service);

10 NOW THEREFORE, the parties, through their respective counsel of record, agree and

11 stipulate and respectfully request:

12 (a) a one-hundred and five (105) day extension of discovery from January 31, 2012 to

13 May 16, 2012;

14 (b) expert disclosures under Fed. R. Civ. P 26(a)(2) due on March 16, 2012;

15 (c) rebuttal expert disclosures due on April 16, 2012; and

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1 (d) all dispositive motions filed on or before June 15, 2012.

2
3 Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

4
5
6 By: /s/ David Marroso

David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

7
8 Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

9
10 By: /s/ Mark Tratos

Mark Tratos
Attorneys for Defendants Floyd Mayweather,
Jr. and Mayweather Promotions

11
12
13 Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

14
15 By: /s/ Malcolm LaVergne

Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DANIEL M. PETROCELLI (Cal S.B. #97802)
(admitted *pro hac vice*)

dpetrocelli@omm.com

DAVID MARROSO (Cal. S.B. #211655)

(admitted *pro hac vice*)

dmarroso@omm.com

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ehone@gordonsilver.com

FRANCESCA V. VAN BUREN

Nevada Bar No. 10260

fvanburen@gordonsilver.com

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Las Vegas, Nevada 89169

Tel: (702) 796-5555

Fax: (702) 369-2666

Attorneys for Plaintiff and Counter-Defendant

Emmanuel "Manny" Pacquiao

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMMANUEL PACQUIAO, a Philippines
resident,

Plaintiff,

v.

FLOYD MAYWEATHER, JR., a Nevada
resident; FLOYD MAYWEATHER, SR., a
Michigan resident; ROGER
MAYWEATHER, a Nevada resident;
MAYWEATHER PROMOTIONS LLC, a
Nevada limited liability company,,

Defendants.

Case No. 2:09-cv-02448 LRH-RJJ

**STIPULATION REGARDING FIRST
EXTENSION OF THE DISCOVERY
CUTOFF**

STIPULATION

Plaintiff Emmanuel Pacquiao, on the one hand, and defendants Floyd Mayweather Jr., Mayweather Promotions, and Floyd Mayweather Sr., on the other hand, by and through their respective counsel of record, hereby agree and stipulate as follows:

WHEREAS, the current discovery cutoff is set for January 31, 2012 (Docket No. 119);

WHEREAS, the parties have been diligently pursuing discovery in this matter;

WHEREAS, the parties have taken seven depositions of parties and third parties in this matter and have at least five additional depositions scheduled to take place in January;

WHEREAS, the parties have collectively served 10 sets of Interrogatories, 9 sets of requests for production, and 4 sets of requests for admission for which responses are complete or will be complete by January 31, 2012;

WHEREAS, the parties have produced hundreds of pages of documents and the Defendants have filed motions to compel discovery regarding medical and financial records;

WHEREAS, plaintiff Pacquiao and defendant Mayweather Jr. both competed in professional boxing matches since the commencement of discovery on June 2, 2011 which required significant time commitments;

WHEREAS, plaintiff Pacquiao is a foreign resident and a Congressman in his native Philippines with duties requiring Pacquiao to be present in the Philippines during extended periods of time during the discovery period;

WHEREAS, the parties have met and conferred numerous times in good faith to reschedule the deposition of Pacquiao to accommodate his Congressional ~~and~~ other duties, ~~in addition to his foreign residence and his deposition has been delayed or disputed several times~~ and his foreign residence;

WHEREAS, the parties will meet and confer in good faith to reschedule the depositions of Leonard Ellerbe and Al Haymon and Plaintiff Pacquiao will notice those depositions accordingly;

WHEREAS, counsel for Pacquiao—Mr. Petrocelli and Mr. Marroso—~~are scheduled to commence~~ commenced a two- to three-week trial in the United States District Court for the Central District of California on January 24, 2012 (trial was originally scheduled for September 6,

2011, but was postponed at the last minute when the case was reassigned to a new judge);

WHEREAS, the parties have ~~many more~~ additional depositions left to be taken in addition to experts;

WHEREAS, Floyd Mayweather and Mayweather Promotions ("Mayweather Parties") have filed Motions to Compel discovery which are pending; WHEREAS, the parties have not previously requested an extension of fact discovery in this case;

WHEREAS, the Court has yet to set a trial date in this matter;

WHEREAS, ~~Plaintiff has identified specific dates~~ Defendants have noticed depositions in February and early March 2012 for the ~~depositions~~ examinations of Manny Pacquiao, Michael Koncz, Robert Arum, and Lucia McKelvey, and ~~agreed to accept~~ Plaintiff has accepted service of the Notices of Deposition and Subpoenas on behalf of each individual (subject to all objections except for proper service); ~~And a deposition date in February for Attorney Michael Heitner but have declined to accept service.~~

NOW THEREFORE, the parties, through their respective counsel of record, agree and stipulate and respectfully request:

(a) a one-hundred ~~twenty and five~~ (120105) day extension of discovery from January 31, 2012 to May ~~31~~, 16, 2012;

(~~f~~b) expert disclosures under Fed. R. Civ. P 26(a)(2) due on ~~April 1~~, March 16, 2012;

(~~g~~c) rebuttal expert disclosures due on ~~May 1~~, April 16, 2012; and

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(~~h~~d) all dispositive motions filed on or before June ~~30~~15, 2012.

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Dated: January [REDACTED], 2012

DANIEL M. PETROCELLI
DAVID MARROSO
O'MELVENY & MYERS, LLP

By: /s/ David Marroso
David Marroso
Attorneys for Plaintiff Emmanuel Pacquiao

Dated: January [REDACTED], 2012

MARK TRATOS
GREENBERG TRAURIG, LLP

By: /s/ Mark Tratos
Mark Tratos
Attorneys for Defendants Floyd Mayweather,
Jr. and Mayweather Promotions

Dated: January [REDACTED], 2012

MALCOLM LAVERGNE
THE LAVERGNE LAW GROUP

By: /s/ Malcolm LaVergne
Mark Tratos
Attorneys for Defendant Floyd Mayweather Sr.

ATTESTATION OF FILING

Pursuant to the Electronic Filing Procedures dated 24 August 2006 (Revised) of the United States District Court for the District of Nevada, I hereby attest that I have obtained concurrence in the filing of this Stipulation from all of the parties listed in the signature blocks above.

By: _____ /s/ David Marroso

David Marroso

DATED: _____

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

Document comparison by Workshare Professional on Friday, January 27, 2012
12:56:57 PM

Input:	
Document 1 ID	file:///C:/Users/omm16114/Desktop/Proposed Stipulation re Extension of Discovery.doc
Description	Proposed Stipulation re Extension of Discovery
Document 2 ID	file:///C:/Users/omm16114/Desktop/Proposed Stipulation re Extension of Discovery Clean Version.doc
Description	Proposed Stipulation re Extension of Discovery Clean Version
Rendering set	standard

Legend:	
<u>Insertion</u>	
Deletion	
Moved from	
Moved to	
Style change	
Format change	
Moved deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	32
Deletions	27
Moved from	0
Moved to	0
Style change	0
Format changed	0
Total changes	59

EXHIBIT 9

From: TratosM@gtlaw.com
Sent: Friday, January 27, 2012 11:47 PM
To: kummert@gtlaw.com; Whitman, Harrison
Cc: Marroso, David; BurrellL@gtlaw.com; neyc@gtlaw.com
Subject: Re: Pacquiao (Proposed Stipulation for extension)

Only if Granted Folks. Mark.

----- Original Message -----

From: Kummer, Thomas F. (Shld-LV-LT)
Sent: Friday, January 27, 2012 10:03 PM
To: 'Whitman, Harrison' <hwhitman@omm.com>
Cc: Marroso, David <DMarroso@OMM.com>; Tratos, Mark (Shld-LV-Ent); Burrell, Laraine (Assoc-LV-LT); Ney, Cynthia (Para-LV-LT)
Subject: RE: Pacquiao (Proposed Stipulation for extension)

Harrison: We will withdraw the motion. Laraine, can you prepare a notice of withdrawl.
Thanks. Tom

-----Original Message-----

From: Whitman, Harrison [mailto:hwhitman@omm.com]
Sent: Friday, January 27, 2012 7:30 PM
To: Kummer, Thomas F. (Shld-LV-LT)
Cc: Marroso, David
Subject: Re: Pacquiao (Proposed Stipulation for extension)

Thanks Tom. Now that the stipulation is on file, please confirm that Mr. Mayweather and Mayweather Promotions will withdraw their motion to extend discovery.

Harrison

----- Original Message -----

From: kummert@gtlaw.com [mailto:kummert@gtlaw.com]
Sent: Friday, January 27, 2012 01:25 PM
To: Whitman, Harrison; neyc@gtlaw.com <neyc@gtlaw.com>; TratosM@gtlaw.com <TratosM@gtlaw.com>; BurrellL@gtlaw.com <BurrellL@gtlaw.com>; rabeb@gtlaw.com <rabeb@gtlaw.com>; overtonp@gtlaw.com <overtonp@gtlaw.com>; weisst@gtlaw.com <weist@gtlaw.com>; robertsde@gtlaw.com <robertsde@gtlaw.com>; ChavezR@gtlaw.com <ChavezR@gtlaw.com>
Cc: Marroso, David; Petrocelli, Daniel; Welsh, Robert; EHone@GORDONSILVER.com <EHone@GORDONSILVER.com>; FVanburen@GORDONSILVER.com <FVanburen@GORDONSILVER.com>; mlavergne@lavergnelaw.com <mlavergne@lavergnelaw.com>
Subject: RE: Pacquiao (Proposed Stipulation for extension)

Harrison: We are good to go. You may file on our behalf. Thanks. Tom

Thomas F. Kummer
Shareholder
Greenberg Traurig, LLP | Suite 400 North
3773 Howard Hughes Parkway | Las Vegas, Nevada 89169
Tel 702.938.6866 | Cell 702-528-7447
kummert@gtlaw.com | www.gtlaw.com

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-----Original Message-----

From: Whitman, Harrison [mailto:hwhitman@omm.com]

Sent: Friday, January 27, 2012 1:04 PM

To: Ney, Cynthia (Para-LV-LT); Tratos, Mark (Shld-LV-Ent); Kummer, Thomas F. (Shld-LV-LT); Burrell, Laraine (Assoc-LV-LT); Rabe, Bethany L. (Assoc-LV-Ent); Overton, Pamela M. (Shld-Phx-LT); Weiss, Tracy L. (Assoc-Phx-LT); Roberts, Denise (Secy-LV-Ent); Chavez, Rae Ann (Secy-LV-LT)

Cc: Marroso, David; Petrocelli, Daniel; Welsh, Robert; EHone@GORDONSILVER.com;

FVanburen@GORDONSILVER.com; mlavergne@lavergnelaw.com

Subject: RE: Pacquiao (Proposed Stipulation for extension)

Please find attached our revised stipulation and a redline of the changes from the stipulation circulated yesterday. Please let us know if we are authorized to file on your behalf.

Regards,

Harrison

-----Original Message-----

From: neyc@gtlaw.com [mailto:neyc@gtlaw.com]

Sent: Thursday, January 26, 2012 12:40 PM

To: Whitman, Harrison; Marroso, David; Petrocelli, Daniel; EHone@GORDONSILVER.com;

FVanburen@GORDONSILVER.com; mlavergne@lavergnelaw.com

Cc: TratosM@gtlaw.com; kummert@gtlaw.com; BurrellL@gtlaw.com; rabe@gtlaw.com;

overtonp@gtlaw.com; weisst@gtlaw.com; robertsde@gtlaw.com; ChavezR@gtlaw.com

Subject: Pacquiao (Proposed Stipulation for extension)

<<Proposed Stipulation for extension.pdf>> Being sent on Mark Tratos' behalf, attached please find a proposed stipulation for extension of discovery along with a PDF version reflecting the redline changes. Please advise if the attached is acceptable to you. Thank you.

Cynthia Ney

Paralegal

Greenberg Traurig, LLP | Suite 400 North

3773 Howard Hughes Parkway | Las Vegas, Nevada 89169

Tel 702.599.8009

neyc@gtlaw.com | www.gtlaw.com

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